

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LUMINATI NETWORKS LTD.

v.

BI SCIENCE, INC.

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Case No. 2:18-CV-0483-JRG

**JOINT MOTION FOR AMENDMENT OF PROTECTIVE ORDER AND
AUTHORIZATION TO USE UNDER SEAL FILINGS IN ISRAEL PROCEEDING**

Plaintiff Luminati Networks Ltd. (“Plaintiff”) and Defendant BI Science (2009) Ltd., also known as BI Science, Inc. (“Defendant”) (collectively, “the Parties”) respectfully request that the Court amend the Protective Order to define “Related Proceeding” as including the case captioned Luminati Networks Ltd. v. B.I. Science (2009) Ltd., case no. 62712-05-20, filed in the District Court in Tel Aviv, Israel (“Israel Proceeding”). In addition, the Parties respectfully request that the Court permit the under seal April 13, 2020 hearing transcript, other under seal filings, and protected materials including documents designated “CONFIDENTIAL” and/or “RESTRICTED – ATTORNEYS’ EYES ONLY” be disclosed to (a) the Israel Proceeding counsel of record and employees of such counsel assigned to are reasonably necessary to assist such counsel in the Israel Proceeding, and (b) the Israel Proceeding Court and its personnel to the extent that such documents are protected from disclosure outside the Court and its personnel in the Israel Proceeding.

Dated: June 25, 2020

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